



CONGRESSIONAL TESTIMONY



TESTIMONY OF

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SUBCOMMITTEE ON SUPERFUND, OCEAN AND WATER PROTECTION

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I am Dr. J. Donald Millar, Director of the National Institute for Occupational Safety and Health (NIOSH) of the Centers for Disease Control, in the Public Health Service of the Department of Health and Human Services. I appreciate this opportunity to report to you on the activities of NIOSH in the area of indoor air quality.

Our experience with evaluating and understanding indoor air quality problems is based on the research and technical assistance that we have conducted under the mandates of the Occupational Safety and Health Act (OSH Act). Our knowledge, therefore, relates to the health effects on workers in nonresidential and nonindustrial workplaces, including Federal buildings, schools, and other public buildings, commercial buildings and portions of commercial vehicles occupied by workers. In addition to dealing with air quality, this knowledge base includes data on ergonomic and psychosocial problems that also affect workers.

More specifically, most of our knowledge on indoor air quality problems has been generated on the "technical assistance side" of our responsibilities under the OSH Act. This assistance is conducted under Section 20(a)(6) of the OSH Act through our Health Hazard Evaluation (HHE) Program, where we respond to requests from employers, employees, employee representatives, State and local agencies and other Federal agencies. Presented below is a brief narrative of how the HHE Program is utilized for indoor air quality investigations, and what we have learned from these investigations in regard to the extent of the problem. Additional details are shown in Enclosure I.

In the 1970's, following the Arab oil embargo, energy conservation programs were encouraged throughout the United States. The operations of buildings changed in an effort to conserve fossil fuels and operating costs. Ventilation rates were reduced and buildings were sealed to prevent infiltration of untempered outside air (hot, humid air in the summer months and cold, dry air in the winter months). At the same time, there was a revolution occurring in buildings throughout the country. Computers forced a change in office procedures and productivity leading to ergonomic and organizational stress problems. Some of these new office technologies brought with them chemical and physical hazards.

We saw the effect of the conservation measures, as well as problems associated with the shifts in office automation (e.g. video display terminals, vision problems), and concern about asbestos and radiation, through increases in requests for assistance in the HHE Program. Of the 1,200 Health Hazard Evaluations between 1971 and 1978, NIOSH investigated six indoor air quality problems or 0.5% of the total. From 1978 to 1980, the percentage of HHE's have averaged 12% of all health hazard evaluations. More recently, on an annual basis, this has increased to approximately 20%. For example, in FY 1988 through the present, NIOSH's toll free information number has received an average of approximately 60 inquiries and requests for assistance per month on indoor air quality problems. In 1988, in addition to providing background information and a copy of NIOSH's indoor air quality guidance document (Enclosure I) to most of these callers, NIOSH researchers conducted 45 field investigations.

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Table 1 presents the number of HHE investigations by building type since the Program was initiated in 1971. (These totals do not include complaints arising from asbestos contamination--the number of which also is significant--or complaints regarding radon.)

TABLE 1

NIOSH Indoor Air Quality
Investigations by Building Type
(through December 1988)

Building Type	Number Completed	Percent of Total
Government and Business Offices	426	80
Schools and Colleges	68	13
Health Care Facilities	35	7
Total:	529	100

We have not seen a decrease in indoor air problems and we are concerned that as the U.S. moves more and more to a service and information economy, with increases in office workers, the problems will increase.

Indoor air quality problems may arise from a variety of sources including human metabolic activity, smoking, structural components of the building and contents, biological contamination, office and mechanical equipment, and outside air pollutants that enter the building. Commonly, the symptoms and health complaints reported by workers are diverse and not specific enough to readily identify the causative agent (Table 2). The workplace environment is implicated by the fact that these symptoms can be severe enough to result in missed work, reassignment, and even termination. This causes increased anxiety among the workers and, often times, makes the investigation of these problems even more difficult.

TABLE 2

Common Health Complaints

Eye Irritation
Dry Throat
Headache
Fatigue
Sinus Congestion
Skin Irritation
Shortness of Breath
Cough
Dizziness
Nausea
Sneezing
Nose Irritation

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Although some of these episodes may be made up of several factors combined, we have classified the results found in our HHE Program by primary type of problem found: contamination from the building materials (4%); microbial contamination (5%); other contamination from inside the building (15%); contamination from outside the building (10%); inadequate ventilation (53%); and unknown (13%).

As mentioned above, in over half of our indoor air quality investigations, inadequate ventilation was found to be the cause of complaints. Heating, ventilating, and air conditioning (HVAC) conditions that can cause indoor air quality problems include migration of odors or chemical hazards between building areas, re-entrainment of building exhaust through heat recover devices or improper placement of exhaust and intake stacks, buildup of microorganisms in HVAC system components and poor odor and environmental control due to insufficient "fresh" outdoor air. The insufficient use of "fresh" outdoor air has been compounded by reduction in ventilation airflows because of energy conservation. The inadequacy of building ventilation can be evaluated by monitoring ambient carbon dioxide (CO₂) concentrations, temperature, humidity, and airflow. However other chemical agents from sources other than human occupants also increase with adequate building ventilation.

In 20-25% of our indoor air quality surveys, sources inside the building have been identified as the major generators of indoor air pollution. To date, common sources that have been identified include: duplicators-methyl alcohol; signature machines - butyl methacrylate; blueprint copiers--ammonia; acetic acid; pesticides; boiler additives--diethyl ethanolamine; cleaning agents; tobacco smoke and combustion gases; foam insulation, particle board, plywood, construction glues and adhesives--formaldehyde, and organic solvents; lined ventilation ducts--fibrous glass; silicone caulking and curing agents. In these situations, we have found that low concentrations of agents need to be monitored since odor thresholds, comfort and unusual stimuli may be the significant factors rather than higher concentrations where health effects have been established. Also, in many instances no evaluation criteria exist and the investigators must compare areas where complaints are frequent with areas which have no complaints to search for chemical, biological, physical, and organizational factors which may be the cause. Given the problems with identifying emission sources and the need to measure at low levels, sensitive and specific direct-reading instruments need to be followed with highly specific, low level chemical analysis in the laboratory.

To complicate the investigations concerning poor air quality, ergonomics and psychosocial issues often are encountered. For example, our research teams, composed of behavioral scientists, physicians and industrial hygienists, have investigated a series of mass illness outbreaks in various work settings for which there was no apparent physical or chemical cause. The reported symptoms are typically vague and nonspecific, and frequently are described by workers as ill defined contaminants in the workplace (e.g., bad odors, stuffy or heavy air). Questionnaire surveys and interviews of both affected and unaffected workers suggest that the expression of the symptoms may have been exacerbated by a variety of ergonomic, organizational and psychosocial stresses which increase worker job and life-dissatisfaction.

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Aside from NIOSH experiences discussed above, there have been considerable activities by other governmental and nongovernmental groups worldwide of which I am sure you are aware. Some major examples of these are as follows:

1. The National Research Council's Assembly of Life Science published "Indoor Air Pollutants" in 1981. The report lists a number of chemicals implicated in indoor air pollutant problems without assessing their importance. The Assembly also recommended that monitoring protocols and special instruments be developed to assess indoor air pollutants; that complaints of malaise, headache, stuffiness, and eye and throat irritation be studied; that the lowering of work productivity due to indoor pollution and associated discomfort be investigated; and that the influences of building design on the concentration of pollutants in commercial facilities be conducted.
2. The Environmental Protection Agency (EPA) published "EPA Indoor Air Quality Implementation Plan" in 1987 which not only described EPA's research agenda at that time, but dealt with those indoor air quality issues that concerned other Federal agencies. The document included a bibliography of indoor air quality literature containing over 2,000 entries.
3. In 1988, the Health and Safety Executive of Great Britain issued a report "Sick Building Syndrome: A Review." This report summarizes their experiences with "sick building syndrome," and discusses symptoms, common features of "sick buildings" and possible causes. Their experiences mirror that information found by our NHE Program.
4. A 1988 EPA publication, "Indoor Air Quality in Public Buildings" reported that concentrations of volatile organic compounds in new buildings were found to be as much as 100 times higher than those found outdoors.
5. Volume II of the Environmental Protection Agency's Report to Congress prepared in 1988/89 under Title IV of the Superfund Amendments and Reauthorization Act of 1986 highlights an up-to-date summary of the "Assessment and Control of Indoor Air Pollution." This volume discusses such issues as (a) factors affecting indoor air quality; (b) sources of pollutants and health effects; and (c) economic impacts.

These examples support the point that indoor air quality problems associated with worker health are significant and require continued vigilance.

In regard to your questions pertaining specifically to the Indoor Air Quality Act (S.657), the Administration has not yet taken a position on the specific contents of the proposed legislation.

Thank you for the opportunity to submit this testimony to the record.

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